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March 25, 2011

The Honorable Ken Salazar
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAR 28 2011

Re: Critical issues not adequately addressed by the Northern Arizona Proposed
Withdrawal Draft Environmental Impact Statement (DEIS), BLM/AZ/PL-11/002

Dear Secretary Salazar,

The Sustainable Economic Development Initiative of Northern Arizona (SEDI) is a broad based 501 (c)3 non-profit organization whose mission is to advance sustainable economic development in northern Arizona by providing enabling, facilitating, and collaborative support to businesses, educational and government entities, and other organizations that are working to increase social equity, economic prosperity, and ecological health in the region. Based on this mission, SEDI offers the following advisory comments on the adequacy of the proposed DEIS.

According to SEDI's analysis which follows, it is critically important to the economic development, social equity, and ecological health of the Colorado Plateau that the withdrawal of 1,017,776 acres from mineral exploration and mining be extended for at least 20 years (Alternative B).

The Draft Environmental Impact Statement on the proposed withdrawal understates the negative impacts of not withdrawing this land (Alternatives A, C and D). The negative impacts of mineral exploration and mining are understated because of 1) factors that are not considered in the DEIS, and 2) factors whose negative impacts are understated in the DEIS.

The most significant factors not considered in the DEIS are the economic, safety and environmental impacts of the transport of uranium ore from the 30 mines proposed if no lands are withdrawn (DEIS Alternative A). SEDI's analysis indicates that the DEIS calculation of 300,165 round trips from mines in the north, east, and south parcels to the White Mesa Mill would require ore hauling trucks to travel a total of 184,435,893 miles over the life of the mines. According to US Department of Transportation accident data, these trips would be expected to result in 367 accidents, causing 151 injuries and 4 deaths. (See the attached spreadsheet for this analysis of US Department of Transportation data)

There are several important negative impacts of these accidents not considered in the DEIS, including:

- The economic impact on Grand Canyon tourism: The procedures for dealing with accidents involving even low concentration uranium ore are complex and time consuming, and could involve multi-day road closures or significant traffic delays.¹ According to the accident procedures of Denison's trucking subcontractor, such accidents could involve cargo spills, injuries, fires, fuel spills, downed power lines, traffic hazards, and potential pollution of streams or rivers. Uranium ore hauls from the east and south parcels, totaling 91,780 trips, utilize the only road access routes to the Grand Canyon. Any accident on these Grand Canyon access routes would significantly impact the approximately 5 million annual visitors and \$687 million in annual regional economic activity created by the Grand Canyon.²
- The economic and social safety impacts of accidents, injuries and deaths: Beyond the economic impact from access route closures and delays, 367 accidents, causing 151 injuries and 4 deaths would have significant direct and indirect economic and social safety impacts on the region. Although these impacts are difficult to quantify because of the unknown severity of each accidents and injury, and the unknown lost income for the wide range of potential accident victims and their families, these impacts would be significant.
- Other impacts on public safety: The 300,165 uranium ore trips planned would travel through 20 Northern Arizona and Southern Utah cities and towns with a combined population of over 120,000 people. Any accidents in or near these cities or towns would have more significant social and economic impacts than accidents on the open road.

These accident estimates do not include the impact of high winds or tornados which are common on the route from the south parcel through Flagstaff. For example, four tornados in October 2010 derailed 28 railroad cars, turned over tractor-trailer rigs on the freeway, damaged 30 houses, and destroyed the RVs on a sales lot in Bellemont (on the route between Williams and Flagstaff).

Some of the negative factors resulting from not withdrawing this land from mineral exploration and mining which are not adequately covered in the DEIS include:

- Fugitive uranium dust from haul trucks and accidents: Much more fugitive uranium dust and other air pollutants would impact the populations of 20 Northern Arizona and Southern Utah cities and towns than is counted in the DEIS. In its estimate of 42,345,000 pounds of fugitive dust and other air pollutants from uranium ore mined in the impact area, the DEIS does not include uranium ore dust escaping from haul trucks traveling over 184.4 million miles on trips between mines and the White Mesa Mill, or any spills that might be caused by the 367 accidents that are expected during the 300,165 trips between mine and mill. (See the attached spreadsheet for this analysis of US Department of Transportation data)

¹ See Hammon Trucking, "Traffic Accident or Cargo Spill Response Procedure for shipments from Denison Mines (USA) Corp.'s Arizona Strip Mines to the White Mesa Mill", January, 2010; and Denison Mines (USA) Corp., "Transportation Policy", July 5, 2007.

² Northern Arizona University, "Grand Canyon National Park Northern Arizona Tourism Study", April 2005.

- System effect impacts: The DEIS focuses on quantifying the impacts of mineral exploration and mining in many specific characteristics of the area, e.g., air quality, soil, water, vegetation, fish and wildlife, visual and cultural resources, etc. These components are also part of a larger system which is greater than the sum of its parts, and includes the overall economic vitality, social well-being, and environmental health of the region. The DEIS, however, does not adequately account for the negative impact of these systems effects (particularly on a full cost, life cycle accounting basis) if the land is not withdrawn (Alternatives A, C or D). For example, air pollution estimates do not include the air pollution generated from other parts of the system of exploration and mining on these parcels, or pollution that occurs outside the immediate area, such as the air pollution from:
 - generating the energy required for pumps to surface 316 million gallons of ground water,
 - refining and transporting the fuel for all the vehicles and other machinery used in mining and transportation, and
 - generating the electricity used in mining and related operations
 While these air pollution impacts might be considered indirect or not local, these negative impacts are not included in the indirect impacts mentioned in the DEIS.

Examples of other system effects not considered in the DEIS include:

- Significant weather changes over the next 20 years, including extreme storm events increasing in severity and frequency that might breach containment ponds; and the probable increase in drought conditions in the Southwest that would change stream, spring, and well levels and the relative concentrations of mining pollution and uranium leaks into water tables and potentially the Colorado River.
- Black Swan effects – refers to the disproportionate role of very high-impact, hard to predict, and rare events in history and science.³ A recent example is the impact of the 9.0 earthquake and tsunami on several nuclear reactors in Japan. Apparently, to save money both the design and operation of these nuclear reactors were based on more probable disturbances. Last year's BP oil spill in the Gulf provides another example of cost-cutting shortcuts when a full scale blow-out was deemed to be improbable. When an improbable event could be catastrophic, with long-term impacts, however, decision-making based only on probabilities is inadequate. In the case of chemical water pollution by mining wastes or uranium, for example, the DEIS claims the overall cumulative risk for perched aquifer springs is moderate for the north parcel and negligible for the east and south parcels.⁴ Other DEIS comments, however, do not support this conclusion. For example:

³ Taleb, Nassim Nicholas, 2007: The Black Swan, Random House, New York.

⁴ DEIS, p 4 – 84

- ✓ the DEIS acknowledges the estimated pollution impact probability to north parcel springs as 13.2% under Alternative A,⁵ at the same time noting that “incomplete and unavailable information adds to the uncertainty of analyses.”⁶
- ✓ the DEIS also notes that “there is currently no conclusive evidence from well and spring sampling data that breccia pipe uranium mining operations in the North Parcel have impacted the chemical quality of groundwater in the regional R-aquifer,” but acknowledges that “the travel time for some impacts to wells and springs may be longer than the time that has passed since uranium mining began in the North Parcel.”⁷
- ✓ the DEIS comes close to acknowledging the potential impact of current level drought conditions when it notes that “impacts to R-aquifer springs range from negligible to major because, whereas the introduction of mine drainage would have a negligible impact (concentrations of uranium and arsenic remain at ambient levels) where spring flow is large (East and South parcels), there might be a major impact (exceedances of drinking water quality standards) where spring flow is small (South Rim springs north of South Parcel).”⁸ Increasing drought conditions would likely make increase the impact because of reduced flows in all springs.

These comments do not support the precision implied in an impact probability of 13.2%, or a conclusion that impact effects are “negligible”.

Even a characterization of the potential impact of uranium contamination of the Colorado River as 13.2% or as “negligible” creates an unacceptable risk given the significant consequences of an event characterized as “improbable”.

One way of dealing with the possibility of black swan events is use a Failure Mode and Effects Analysis (FMEA) customized to the uranium ore mining and transportation process on a full life cycle basis, i.e., covering the full life cycle of uranium ore’s pollution potency. This approach provides a way to incorporate low probability but high impact outcomes into the decision making process. We were not able to identify any consideration of this important analytical approach in the DEIS.

The DEIS has identified many significant negative impacts of not withdrawing the land in these three parcels from further minerals exploration or mining for the next 20 years, i.e., not adopting Alternative B. Even without considering the additional negative effects identified by SEDI or the inadequacies of the existing DEIS analysis, it seems clear that the economic benefits of Alternative A are not sufficient to warrant the long-term and significant economic costs, as well as the social health, safety, and environmental impacts that would be incurred. When the additional negative impacts identified by SEDI are included, it is SEDI’s conclusion that the DEIS estimates of the negative impacts of Alternative A are significantly understated, which means

⁵ DEIS, p 4 – 70

⁶ DEIS, p 4 – 65

⁷ DEIS, p 4 – 60

⁸ DEIS, p 4 – 80

that the case is even stronger for extending the moratorium on minerals exploration and mining for at least 20 years (Alternative B).

If you have any questions on our analyses or conclusions, please feel free to contact me for additional details.

Best regards,

A handwritten signature in black ink, appearing to read "Ronald Hubert", with a long horizontal stroke extending to the right.

Ronald Hubert, MBA, MS (Environmental Science and Policy)
President and Chairman of the Board
Sustainable Economic Development Initiative of Northern Arizona

Enclosure: Transportation Impacts of Grand Canyon Uranium Mining, Alternative A

cc: Mr. Scott Florence, District Manager, BLM Arizona Strip District Office

SEDI Comments - Transportation Impact of
Grand Canyon Uranium Mining - Alternative A

	Interstate Miles	Other Arterials	Collectors	Local	Total	Notes:
Kaibab area mines - South						
Number of miles/round trip	87	575		20	682	Per AAA maps and MapQuest *
Number of trips	69,540	69,540		69,540	69,540	DEIS
Total miles traveled	6,022,164	39,985,500		1,390,800	47,398,464	2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Death rate/100 M miles	1.04	2.23	2.79	3.18		
Expected deaths	0.06	0.89		0.04	1	
Injury rate/100 M miles						2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Expected injuries					39	
Accident rate/100 M miles						2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Expected accidents					199	
					94	
North parcel mines						
Number of miles/round trip		428	135	40	603	Per AAA maps and MapQuest **
Number of trips		208,385	208,385	208,385	208,385	DEIS
Total miles traveled		89,188,780	28,215,329	8,335,400	125,739,509	2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Death rate/100 M miles	1.04	2.23	2.79	3.18		
Expected deaths		1.99	0.79	0.27	3	
Injury rate/100 M miles						2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Expected injuries					82	
					103	
Accident rate/100 M miles						2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Expected accidents					199	
					250	

SEDI Comments - Transportation Impact of
Grand Canyon Uranium Mining - Alternative A

East parcel mines								
Number of miles/round trip								Per AAA maps and MapQuest ***
Number of trips		297	191	20	508			DEIS
Total miles traveled		22,240	22,240	22,240	66,720			
		6,605,280	4,247,840	444,800	11,297,920			2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Death rate/100 M miles	1.04	2.23	2.79	3.18				
Expected deaths		0.15	0.12	0.01	0			
								2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Injury rate/100 M miles					82			
Expected injuries					9			
								2007 data from US Dept of Transportation: http://www.bts.gov/publications/national_transportation_statistics/2009/index.html
Accident rate/100 M miles					199			
Expected accidents					22			
Summary	South Parcel	North Parcel	East Parcel	Total				
Total Miles Traveled	47,398,464	125,739,509	11,297,920	184,435,893				
Accidents	94	250	22	367				
Injuries	39	103	9	151				
Deaths	1	3	0	4				
* Assumes route is from the mine to Williams, Flagstaff, Tuba City, Kayenta, Blanding								
** Assumes route is from the mine to Fredonia, Kanab, Page, Kaibito, Kayenta, Mexican Hat, Blanding								
*** Assumes route is from the mine to 89A, Page, Kaibito, Kayenta, Mexican Hat, Blanding								



**AMERICAN
WHITewater**

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March 24, 2011

Sent by email to: **NAZproposedwithdrawal@azblm.org**

BUREAU OF LAND MANAGEMENT
ST. GEORGE FIELD OFFICE
MAR 28 2011

Northern Arizona Proposed Withdrawal Project
Attn: Scott Florence, District Manager
Bureau of Land Management
Arizona Strip District Office
345 East Riverside Drive
St. George, UT 84790-6714

Dear Mr. Florence:

Please accept these formal comments on the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement (DEIS) from American Whitewater and the undersigned paddling-related clubs and organizations. Together, we represent thousands of non-commercial whitewater kayakers, rafters, and canoeists that support the proposed 20-year withdrawal of approximately 1,010,776 acres of federal lands from new mining claims.

Our members have a deep personal connection with the Grand Canyon of the Colorado River and many more aspire to develop one. For many of our members, paddling the Grand Canyon is a once in a lifetime opportunity requiring years of waiting, planning, and saving to bring to fruition. The Grand Canyon offers the longest backcountry river journey in the lower 48 states, and is recognized around the world as one of the most beautiful, remote, and challenging river trips on the planet. Demand for this journey far exceeds the number of permits allotted, and citizens from across the country have an equal chance of securing a permit. We are deeply concerned that new uranium mining on one million acres around the Canyon could threaten this iconic national treasure.

In your public letter accompanying the DEIS, you stressed the importance of offering substantive comments, which "question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis." Your analysis failed to consider the impacts that unrestricted or under-restricted uranium mining could have on Grand Canyon river trips. The people on these trips, our members, literally live in the canyon for weeks at a time. They marvel over, drink from, and swim in the Colorado River as well as cherished tributaries like the Little Colorado River, Kanab Creek, and Havasu Creek. Experiencing each of these streams is a vital part of paddling the Grand Canyon, and the water quality and quantity of each is threatened by uranium

mining. **Failing to consider the very real risks to this incomparable and irreplaceable recreational experience is a massive oversight in the DEIS.**

Your analysis seeks to quantify the risks of allowing uranium mining near the Grand Canyon. The results of your analysis confirm that risks of long term water quality and quantity impacts exist that could impact iconic tributaries to the Grand Canyon. We believe that by excluding the Grand Canyon paddling experience from your analysis, including hiking along, swimming in, and drinking from the tributaries, you have miscalculated the risks of allowing future uranium mining. Radiation and other pollution in these streams would directly impact human health and perceptions of wildness. Even very small reductions in flow in tributaries and springs would impact the experience of these places.

The quality of the recreation experience in the Grand Canyon is so unique and valued by the American public that your agency should seek to minimize risks to that experience – no matter how small you believe those risks to be. Likewise, the potential consequences of long term radiation pollution and other uranium mining related impacts to Grand Canyon springs and tributaries are simply too severe to risk.

Therefore, to provide the greatest level of protection for this very special place, and these treasured experiences, we recommend that Secretary of the Interior Ken Salazar's moratorium be upheld and that the BLM adopt **Alternative B, the 20-year withdrawal of approximately 1,010,776 acres of federal mineral estate from the location and entry of new mining claims** under the General Mining Law of 1872.

Thank you for considering our interests.

Sincerely,



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cc: Interior Secretary Ken Salazar
Acting Assistant Secretary Will Shafroth
Director Bob Abbey

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Arizona House of Representatives Phoenix, Arizona 85007

March 17, 2011

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAR 28 2011

Northern Arizona Proposed Withdrawal Project
ATTN: Scott Florence, District Manager
Bureau of Land Management
Arizona Strip District Office
345 East Riverside Drive
St. George, UT 84790-6714

Dear Mr. Florence:

As Arizona legislators, we are extremely concerned about the health and welfare of Arizona residents as well as conservation of important public lands. That is why we are writing in support of protecting one million acres of public lands surrounding Grand Canyon National Park from mining for 20 years, as presented in Alternative B of the Draft Environmental Impact Statement.

Grand Canyon is a crown jewel of our National Park System, a treasure to Arizonans, and an important economic engine for northern Arizona. Grand Canyon has more biological diversity than any other national park in the National Park System. It contains old growth forests and diverse contiguous habitats, plus the Colorado River corridor and the numerous seeps and springs support wildlife, rare plants, and recreation.

The area proposed for withdrawal captures the watershed, as well as groundwater that flows toward seeps and springs inside Grand Canyon National Park and toward neighboring tribal lands. This water is critical as it eventually flows into the Colorado River, which supplies drinking water to millions of people. This withdrawal will help protect the fragile seeps and springs, wildlife habitat, and Native American sacred sites in the lands surrounding the Park.

Uranium mining occurred from the 1960s through the 1980s on the Arizona Strip, the rim of Grand Canyon, and the surrounding tribal lands. The legacy is still being felt today where abandoned mine sites continue to pollute and contaminate air, water and soil.

There are at least 520 abandoned uranium mines throughout the Navajo Nation according to the Environmental Protection Agency. Numerous water sources on the Navajo Nation have been designated unsafe to drink due to contamination from uranium mining and the Navajo people continue to suffer from health impacts related to uranium mining.

Because of that, the Navajo Nation officially banned new uranium mines and mills on reservation land in April 2005 by passing the Dine Natural Resource Protection Act. The Navajo Nation has expressed strong support for the proposed mineral withdrawal. The Hopi, Kaibab-Paiute, Hualapai, and Havasupai tribes, as well as the National Congress of American Indians, have all also expressed support for this proposed mineral withdrawal and for protecting these important lands.

The Orphan Mine located on the south rim of the Grand Canyon closed in 1969. In 2009, the National Park Service contractors initiated removal of the Orphan Mine's surface structure within the fenced industrial area adjacent to Powell Point, a popular Grand Canyon overlook. The Orphan Mine has been leaching so much contamination into Horn Creek that the creek's waters have been declared unsafe for drinking. The cost of this cleanup is expected to exceed \$15 million and taxpayers are footing the bill.

The toxic Atlas uranium mill tailings pile abandoned in 1984 by a company in Moab, Utah will cost taxpayers \$1 billion to remove from the Colorado River flood plain. The Atlas Mill is one of hundreds of places where uranium

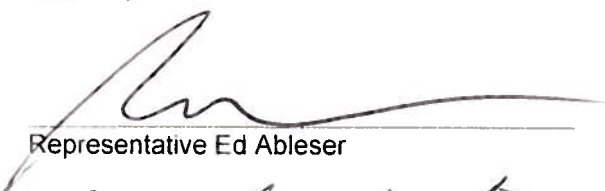
mining has left a poisonous footprint on our landscape, leaving 16 million tons of radioactive mill waste leaking into the Colorado River, which supplies drinking water supply for 25 million people downstream.

There are many reasons to support this proposed mineral withdrawal. The cultural, ecological, and recreational significance of the Kaibab National Forest and Bureau of Land Management lands cannot be overstated; nor can the threats that uranium mining poses to these lands. There are critical economic reasons to support their protection, as well. Grand Canyon National Park generates hundreds of millions of dollars in annual revenue for Arizona, Utah, and Nevada. Uranium mining and the threat of contamination or industrialization threatens the livelihoods of local residents for temporary profits for the foreign mining companies. Tens of millions of our taxpayer dollars are already being spent to clean up abandoned uranium mines, mills, and dumps in the Grand Canyon region, while hundreds of abandoned mines continue to pollute the air and water.


We should not risk the costs of future clean ups or harming the health of Arizonans and the lands and waters upon which they depend.

Thank you for considering our comments.

Sincerely,



Representative Ed Ableser



Representative Ben Arredondo



Representative Tom Chabin



Representative Ruben Gallego



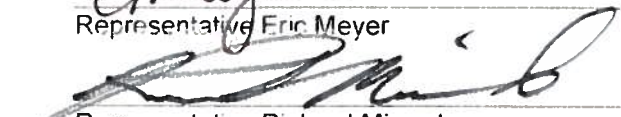
Representative Albert Hale



Representative Katie Hobbs




Representative Eric Meyer



Representative Richard Miranda



Representative Daniel Patterson



Representative Anna Tovar



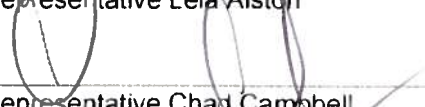
Senator Paula Aboud



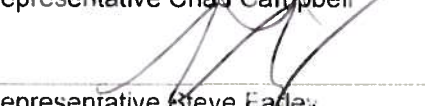
Senator Steve Gallardo



Representative Leila Alston



Representative Chad Campbell




Representative Steve Farley



Representative Sally Gonzales



Representative Matt Heinz



Representative Debbie McCune Davis



Representative Catherine H. Miranda



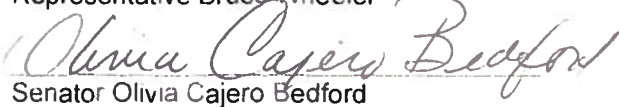
Representative Lynne Pancrazi



Representative Macario Saldate IV



Representative Bruce Wheeler

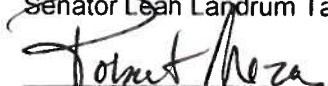



Senator Olivia Cajero Bedford



Senator Jack Jackson Jr.



Senator Leah Landrum Taylor

Senator Robert Meza

Senator Kyrsten Sinema

Senator Linda Lopez

Senator David Schapira

cc. Secretary of Interior, Ken Salazar

Public Comment Form

Please complete the following:

Name Glendora Homer

Address HC 65 Box 2

Pipe Spring, Arizona 86022

E-mail Address ghomer@kaibabpaiute-nsn.gov

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAR 25 2011

☐

Withhold my name and address from public review

☒

I want to be added to a mailing list to receive information via e-mail during the FEIS preparation

☐

I want to be added to a mailing list to receive information via regular mail during the FEIS preparation

Please provide substantive comments, factual information, and other constructive input to help improve the DEIS.
Attach additional pages if necessary.

The National Historic Preservation Act of 1966 created a process under which federal agencies must consider the effects of a proposed project on eligible historic properties before it authorizes any undertaking. They must take into account the potential effects on historic cultural resources of tribes.

The aboriginal cultural resources of the Kaibab Paiute Tribe would be greatly affected. Within the proposed north parcel withdrawal area is the 1. Kanre'uipi (Kanab creek) ecoscape

2. Wa'akarereempa (yellow water) known as Yellowstone Spring.

3. Tinkanivac (Cave water) known as Antelope or moonshine Spring.

4. Aboriginal trails from cave waterspring (Tinkanivac) to the Colorado River

5. Trails along Kanab Creek (Kanre'uipi) to the Tonowap cultural site

6. Traditional subsistence trails for hunting and gathering.

7. Important cultural sites within the Kanab Creek

8. Important mineral deposit

9. Culturally important spiritual trail within Kanab Creek to the Colorado river.

Please use the form on the back of this page to provide comments.

You can also email comments to NAZproposedwithdrawal@azblm.org or mail your comments to: Northern Arizona Proposed Withdrawal Project, ATTN: Scott Florence, District Manager, Bureau of Land Management Arizona Strip District Office, 345 East Riverside Drive, St. George, UT 84790-6714.

Public comments, including names and street addresses of respondents, will be available for public review at the Arizona Strip District Office, 345 East Riverside Drive, St. George, UT 84790, during regular business hours (7:45 a.m. to 5:00 p.m.), Monday through Friday, except holidays.

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently. Such requests will be honored to the extent allowed by law. All comments by organizations or businesses will be made available for public inspection in their entirety.

-----fold here to mail-----

Glendora Homer
HC 65 Box 2
Pipe Spring, AZ. 86022



Bureau of Land Management
Northern Arizona Proposed Withdrawal EIS
345 East Riverside Drive
St. George, UT 84790

George & Frances Alderson

112 Hilton Avenue
Baltimore, Maryland 21228

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAR 25 2011

March 22, 2011

Northern Arizona Proposed Withdrawal Project
Attn: Scott Florence, District Manager
BLM, Arizona Strip District Office
345 East Riverside Dr.
St. George UT 84790-6714

Dear Mr. Florence:

Please include this letter in the record as our comment on the draft EIS. We support the proposed withdrawal of lands around the Grand Canyon from entry under the mining laws, as outlined in Alternative B, Secretary Ken Salazar's proposal. The entire 1 million acres should be withdrawn to protect the three parcels from damage and deterioration caused by mining. We want to thank Secretary Salazar and BLM for the temporary 2-year withdrawal and for all the devoted work that has gone into this EIS.

We are encouraged to read the February 22 editorial in the *Arizona Republic* supporting the 1 million acre withdrawal. We remember that in 1966 the same newspaper was outspoken in favor of building two hydroelectric dams in the Grand Canyon. Evidently public and political opinion in Arizona has changed toward conservation during the past 45 years. That is good news for BLM and it is good news for the Grand Canyon.

We have reviewed the draft EIS and the maps showing the three parcels. We visited the North and East parcels during a vacation trip in 2006. Those areas are being used as essential wildlife habitat, and they are visited by many recreationists. Some visitors are focused on the Grand Canyon, while others are there to enjoy the outlying lands:

- The North Parcel involves road access routes used by visitors to Kanab Creek Wilderness, the North Rim via Highway 67 and the western part of Grand Canyon National Park.
- The East Parcel involves road access via Highway 89A to the North Rim, Vermilion Cliffs National Monument and Paria Canyon-Vermilion Cliffs Wilderness. These lands should be protected from any new impacts from mining.

Alternative B should be adopted. The withdrawal of the three parcels is the only way to prevent unacceptable damage to the Grand Canyon. It would be a mistake to let mining corporations grab any of this land under the old, lax laws dating back to 1872. Under the 1872 mining law, BLM and the Forest Service lack broad discretion to exercise strict control over mining operations. The control measures authorized under existing surface management regulations are completely inadequate to prevent damage to this outstanding wild region.

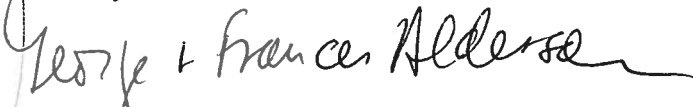
No new mines or exploration should be allowed. Even under Alternative B, the reasonably foreseeable development (RFD) scenarios suggest that 7 new mines could be developed, 11 new exploration projects, 6.4 miles of new roads, and 164 acres of surface disturbance. We want BLM to whittle those numbers down. No doubt the RFD figures are based on a presumption that certain claimants hold valid existing rights as of the date of the segregation in 2009. BLM should develop options ^{even} to those impacts and present recommendations to the Secretary of the Interior and Congress if legislation is necessary. These options could include:

- Contest all mining claims and cancel those that lack a valuable mineral deposit.
- Buy out the rights of any valid claims that remain.
- Exchange the mineral rights for BLM public lands outside the withdrawal area.
- Exchange the mineral rights for rights under the Mineral Leasing Act for coal, oil, gas, phosphates or sodium, on BLM public lands outside the withdrawal area.

We thank BLM and the collaborating agencies for this draft EIS. Please adopt Alternative B as the preferred alternative and put the withdrawal into effect as soon as possible.

Thank you for considering our views.

Sincerely,

A handwritten signature in black ink that reads "George & Frances Alderson". The signature is written in a cursive, flowing style.

George & Frances Alderson

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAR 25 2011

TO:

BLM, Arizona Strip District Office
345 East Riverside Drive, St. George, UT 84790

ATTN:

Scott Florence, District Manager,

SUBJECT:

Northern Arizona Withdrawal Project

FROM:

Herbert Alexander
5175 East Rockledge Lane
Kanab, UT 84741
Mickeydoodle48@yahoo.com

COMMENT:


Concern #1

At a recent meeting of the Kanab City Council, the higher cost of health insurance for city employees, six of whom are suffering from the effects related to air born radiation, was discussed. Because we are considered "Down Winder's" from the effects of being down wind of previous nuclear testing in Nevada, insurance carriers charge us a higher premium. Has this problem been taken into consideration by your team? If so, what conclusions did you come to, and why?

Concern #2

As there will be many trucks loaded with radioactive material and driving through radioactive dust at the loading point traveling through the heart of Kanab, what studies did you do about contamination of trucks before they leave the mine and the processing plant. Also, as trucks will be stopped at the red light in town and will be in close contact with buildings and pedestrians, are there systems in place to monitor radiation there and other places in the city and on public roads. As has been noted repeatedly on the news since the Japan crisis, no amount of radiation is safe.

Thank you, Herb Alexander



Please add me to you e-mail list.

MAR 25 2011

<NAZproposedwithdrawal@azblm.org>:
74.125.244.10 does not like recipient.

From: Margo Macartney <margomacartney@yahoo.com>
To: NAZproposedwithdrawal@azblm.org
Sent: Sun, March 20, 2011 6:22:16 PM
Subject: Public Comment re mining near the Grand Canyon for Department of the Interior

I could not be in Phoenix, Flagstaff or Fredonia for the meetings, but want my comments about mining near or in the Grand Canyon record. Many of us never knew that hardrock mineral exploration and mining has ever been permitted in the Grand Canyon area. I am absolutely against that, and suspect that if such an issue were ever placed on a ballot it would be voted down. God knows how and when it got started. It should stop. Uranium mining in particular is a horrible prospect.

The Grand Canyon is such a precious resource, such a treasure, that to permit any mining is to permit violation of the areas that have been set aside for the people: The BLM land, the Kaibab National Forest and the Grand Canyon National Park.

The options presented, as I understand them, do not include the option I would choose, which is to withdraw about a million acres from hardrock mineral exploration and mining forever.

Given the limited options, I would argue to withdraw a million acres from hardrock mineral exploration and mining for twenty years.

My hope is that in twenty years, someone with a brain and a conscience will emerge to put the brakes on.

Margaret L. Macartney
Bisbee, Arizona 85603

*Tried to email
but was unable to
do that.*
Margaret Macartney
504 Powell St
Bisbee Az 85603



HAVASUPAI TRIBAL COUNCIL

P.O. Box 10 • Supai, Arizona 86435
(928) 448-2731 • Fax (928) 448-2551

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE
MAR 28 2011

March 23, 2011

SUBMITTED VIA MAIL and EMAIL

Northern Arizona Proposed Withdrawal Project
ATTN: Scott Florence, District Manager
Bureau of Land Management Arizona Strip District Office
345 East Riverside Drive
St. George, UT 84790-6714

Re: Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement

Dear Mr. Florence:

The Bureau of Land Management ("BLM") is currently accepting public comments to obtain public feedback concerning the Secretary of Interior's proposed 20-year withdrawal of approximately 1 million acres of federal mineral estate in Northern Arizona from the location and entry of new mining claims. Public meetings were held to receive official comments in Flagstaff, Arizona on March 8, 2011. Governmental Representatives and Elders from the Havasupai Tribe ("Tribe") attended this public meeting and provided oral comments to the BLM in support of the 1 million acre land withdrawal. The Tribe supports the land withdrawal because *any* uranium mining in the proposed area would have an adverse impact on tribal health, air and water quality, and the natural and cultural resources located within the proposed area.

The Havasupai Tribe is a federally-recognized Indian tribe, comprised of 776 members and located at the bottom of the Grand Canyon. The Havasupai Indian Reservation is approximately 188,000 acres and its surrounding lands and waters, many of which are located on federal lands in and around the Grand Canyon National Park, are of immense cultural, religious, spiritual and historic importance to the Tribe. Consequently, myriad places, plants, and animals that possess cultural, religious, spiritual and historic importance for the Havasupai Tribe are situated on federal public lands. Due to the unique location of many of the Tribe's sacred sites, burial grounds, and locations of religious practices on federal public lands, the Tribe relies upon the federal and state governments' responsible management and protection of these lands.

In particular, the Havasupai Tribe relies upon the water quality of Havasu Creek and its surrounding springs, which are connected to the Redwall-Muav aquifer, to sustain the physical, cultural and religious needs of its people. As such, *any* uranium contamination of the air, ground and surface waters or nearby wildlife would adversely and disproportionately affect the health, cultural integrity and religious practices of the Havasupai Tribe and other surrounding Native

American Tribes who rely upon the air and water quality of the nearby springs for drinking water and for numerous ceremonial and medicinal purposes.

Therefore, the Havasupai Tribe strongly supports the proposed 1 million acre land withdrawal from mineral exploration and mining. The Tribe submits these written comments, concerns and questions to supplement the verbal comments made by its Tribal Representatives and Elders at the March 8th meeting concerning the proposed land withdrawal.

1. If the purpose of the “action” Alternatives B, C, and D is to withdraw geographic areas that encompass particularly sensitive resources, including cultural resources, from the adverse impacts of uranium mining, why has the Traditional Cultural Property (“TCP”) of Red Butte not been included in *all* of the action alternatives? In particular, why was Red Butte included in Alternatives B and C, but not Alternative D? Given the fact that the BLM has a legal obligation under the National Historic Preservation Act and the National Environmental Policy Act to protect TCPs from adverse impact, how would Alternative D provide sufficient protection to Red Butte from the detrimental effects of uranium exploration and mining?
2. Given the presence of endangered and threatened plant and animal species, how would Alternatives C, D and the “no action” Alternative adequately protect the endangered and threaten species that occupy the proposed withdrawal area?
3. The various maps of Alternatives B, C and D contained within the Draft EIS (“DEIS”) illustrate the resources present in each parcel including hydrologic, cultural, vegetation and wildlife, and visual and recreational resources. Please explain the methodology used to draw the boundaries of the exact locations of these resources. For example, endangered and threaten animal species located within the proposed withdrawal area, like the California condor, Mexican spotted owl, and Black-footed ferret, are mobile and subject to movement from area to area. Similarly, hydrologic resources, such as groundwater, may be expansive and exact locations may be difficult to pinpoint. Given these considerations regarding the difficulty of delineating the exact location of critical resources, how are the boundaries drawn in the DEIS’s maps, which classify the resources found in particular areas, accurate?
4. The DEIS discusses the variety of social, cultural and natural resources present in the proposed withdrawal areas. How does the DEIS balance the priority of protection for those various types of resources? For instance, what methodology is used to determine that an area with only cultural resources is less deserving of protection than an area with recreational and hydrologic resources?

From the Tribe’s perspective, the “no action” Alternative should not be considered a real option because of the very clear and obvious threat that further mineral exploration and mining presents to the precious cultural, social and natural resources of the Grand Canyon watershed. Therefore, the Havasupai Tribe fully supports Alternative B, the Secretary of the Interior’s complete withdrawal of the 1,010,776 acres of federal locatable mineral estate for 20 years from operation of the Mining Law.

Thank you for your consideration of the Tribe's comments, concerns and questions. Please keep the Havasupai Tribe fully informed of any developments in the land withdrawal process.

Sincerely,



Bernadine Jones, Chairwoman